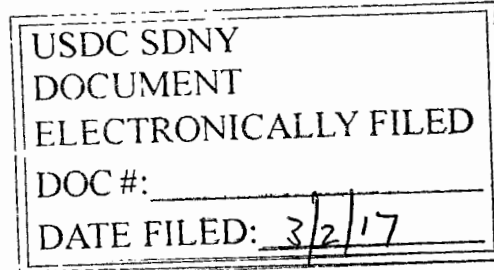


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Via ECF and
Courtesy Copy by Facsimile

January 31, 2017

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **United States v. Tuzman, 15 Cr. 536 (PGG)**

Dear Judge Gardephe:

We write to respectfully request a modification to Mr. Amanat's conditions of pretrial release: (i) relocating his permanent residence to his wife's studio apartment in Manhattan, which she recently began renting, and (ii) permitting him to stay at his parents' home in New Jersey, where he currently resides, up to four nights a week, under a schedule to be arranged with Pretrial Services. Although neither Pretrial Services nor the Government oppose Mr. Amanat permanently relocating to the Southern District of New York, they do oppose the arrangement that permits him to split his time between his wife's apartment and his parents' home, which are located in two separate districts.

Mr. Amanat's conditions of release include a \$2.5 million personal recognizance bond, secured by his ex-wife's house, where his three young children live, with equity of approximately \$400,000, and co-signed by three financially responsible sureties, as well as his father. He is subject to strict pre-trial supervision, including home detention with electronic monitoring, and travel restricted to the District of New Jersey and the Southern and Eastern Districts of New York for medical, legal or religious purposes, with advance notification to, and approval by, Pretrial Services.

The requested arrangement is similar to the arrangement that the Court granted for Kaleil Isaza Tuzman, in which Mr. Isaza Tuzman is permitted to spend up to four nights each week at his home in Loch Sheldrake, New York, while continuing to reside in New York City for the

MEMO ENDORSE:

The application for relief residence is denied. Permitting a defendant to reside in two districts presents significant logistical and practical difficulties for the Pretrial Services office. Acknowledging the parents' medical condition, the Defendant's brother lives with them, and can attend to their needs. Accordingly, it is not necessary for the Defendant to maintain two residences in order to address his parents' medical needs.

RECORDED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.
March 2, 2017

Hon. Paul G. Gardephe
January 31, 2017
Page | 2

remaining nights of the week, thereby allowing “Mr. Isaza Tuzman to continue to meet with his lawyers and mental health care providers in New York City, while lowering the costs associated with living in Manhattan and reducing the burden on [Mr. Isaza Tuzman’s host in New York City].”). (DE #154).

The grounds supporting Mr. Amanat’s application here are similarly compelling. As an initial matter, by living in Manhattan, Mr. Amanat can live with his wife and more easily attend meetings with counsel to prepare his defense. However, because his parents have substantial medical needs—his father has Stage IV cancer, and undergoes regular chemotherapy and radiation treatments, and his mother suffers from heart disease, and recently had double bypass surgery—permitting him to live with them up to four nights a week will enable him to assist with their care and to spend quality time with them. Furthermore, spending time at the New Jersey home will also make it easier for Mr. Amanat’s young son, who is still undergoing rehabilitation from a traumatic brain injury, to spend time with his father. Indeed, he lives with Mr. Amanat at the New Jersey residence for part of each week.

Accordingly, we respectfully request that the Court modify the terms of our client’s bail to permit Mr. Amanat to reside with his wife under home detention with electronic monitoring on the Upper West Side of Manhattan, and to spend up to four nights a week at his parents’ Short Hills, New Jersey home.

If the Court grants this application, we will promptly confer with both Pretrial Services and the Government to agree upon a plan for regular notification and reporting to Pretrial Services regarding Mr. Amanat’s weekly schedule – just as Mr. Isaza Tuzman’s counsel did for Mr. Isaza Tuzman (DE # 152).

I thank the Court for its consideration in this matter.

Respectfully Submitted,

/s/ Eric M. Creizman
Eric M. Creizman

cc: AUSAs Andrea Griswold and Damian Williams (by ECF and email)
Joshua Rothman, United States Pretrial Services Officer (by email)